

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-310-JRG

**REPLY DECLARATION OF ANDREW S. ONG IN SUPPORT OF
DEFENDANTS' OPPOSED MOTION FOR A PARTIAL STAY
PENDING *INTER PARTES* REVIEW OF THE '835 PATENT**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.

2. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of M. Scott Stevens in Support of Petitioner's Reply to Patent Owner's Preliminary Response, dated June 28, 2022, filed in the IPR proceedings of *Nokia of America Corp. v. TQ Delta, LLC*, Case No. IPR2022-00471.

3. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Declaration of Vijay K. Madiseti, Ph.D., dated May 25, 2022, filed in the IPR proceedings of *Nokia of America Corp. v. TQ Delta, LLC*, Case No. IPR2022-00471.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: September 19, 2022

By: /s/ Andrew S. Ong
Andrew S. Ong